

**Lawson's Objections To Summary of
Kurt Reasoner's Deposition Testimony**

Lawson objects to the deposition summary of the deposition of Kurt Reasoner on the following grounds.

The summary mischaracterizes Mr. Reasoner's testimony. For example, the summary states that Providence has a license to RSS. (Summary at 1). However, Mr. Reasoner stated that that license was terminated at the end of October so that Providence is now only licensed to use RQC. (22:7-21). Additionally, the summary states that Providence has not uninstalled RSS from its servers. (Summary at 1.) What Mr. Reasoner stated instead was that he did not know whether Providence had uninstalled RSS from its servers. (26:20-27:1). Mr. Reasoner further stated that, in replacing RSS, Providence would not use the same servers for the new application. (87:14-88:15).

The summary further mischaracterizes Mr. Reasoner's testimony insofar as it is incomplete. As an example, the summary fails to mention that Providence's license to RQC can expire if Lawson does not continue to pay annual maintenance. (33:21-34:3). Also, while the summary mentions that there are circumstances in which Providence may have to pay a supplemental license fee annually, the summary omits the fact that such a payment has only been required once, in 2006 or 2007. (33:14-20). Further, while the summary states that Providence has received no reimbursement or fee reduction due to the removal of RSS support, the summary omits the fact that Providence has never requested such a reduction or even internally discussed making such a request. (40:2-42:1).